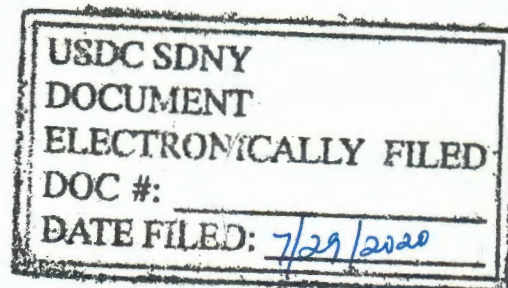




July 28, 2020



VIA ECF

The Honorable Sidney H. Stein
United States District Judge
Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Geury Cruz, 19-cr-795 (United States v. Marte, et al.)

Dear Judge Stein:

On November 13, 2019, I was appointed to represent Geury Cruz as CJA counsel. I write to respectfully request that associate counsel be appointed to assist me in the case. Specifically, I ask that Fern Mechlowitz, a Senior Associate and full-time employee at my firm, be approved to assist me for more than 10 hours at the rate of \$110 an hour, nunc pro tunc to the date of my appointment. As set forth in her attached resume, Ms. Mechlowitz is an experienced attorney who graduated from Stanford University and the University of Virginia School of Law and worked as an associate at both Arnold & Porter and Sullivan & Cromwell. She also clerked for a federal judge, which included work on criminal matters.

Mr. Cruz is charged with 12 other defendants with conspiracy to distribute oxycodone in violation of 21 U.S.C. § 846 (Count 1) and using, carrying or possessing, or aiding and abetting in the use, carrying or possession of a firearm in connection with a drug trafficking offense in violation of 18 U.S.C. § 924(c)(1)(A)(i) and 2 (Count 2). The discovery in this case is extremely voluminous and includes thousands of pages of call records, many hours of videos, photographs of evidence, and thousands of pages of documents. I believe that Ms. Mechlowitz's assistance is necessary to efficiently review the discovery and to represent Mr. Cruz effectively. Ms. Mechlowitz assisted me with Mr. Cruz's emergency renewed bail application that we filed in early April, in light of the pandemic, and that is why I request that her assistance be approved nunc pro tunc to the date of my appointment.

Thank you for your consideration.

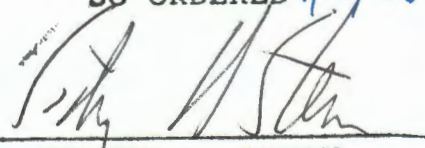
Very truly yours,

/s/ Kristen M. Santillo

KRISTEN M. SANTILLO

Request granted for up to 30 hours, nunc pro tunc from 11/13/2019

SO ORDERED 7/29/2020


SIDNEY H. STEIN
U.S.D.J.